

Adam Hosmer-Henner (NSBN 12779)
Chelsea Latino (NSBN 14227)
Jane Susskind (NSBN 15099)
McDONALD CARANO LLP
100 West Liberty Street, Tenth Floor
Reno, Nevada 89501
(775) 788-2000
ahosmerhenner@mcdonaldcarano.com
clatino@mcdonaldcarano.com
jsusskind@mcdonaldcarano.com

LATHAM & WATKINS LLP
Serrin Turner (*pro hac vice* to be filed)
serrin.turner@lw.com
1271 Avenue of the Americas
New York, New York 10020-4834
Telephone: +1.212.906.1200

*Attorneys for Defendant
Caesars Entertainment, Inc.*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DHAMAN GILL, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

CAESARS ENTERTAINMENT, INC.,

Defendants.

Case No. 2:23-cv-01656-CDS-DJA

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING TIME FOR
DEFENDANT CAESARS
ENTERTAINMENT, INC. TO RESPOND
TO COMPLAINT
(FIRST REQUEST)**

Defendant Caesars Entertainment, Inc. (“Caesars”) and Plaintiff Dhaman Gill (“Plaintiff”),
by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request
that the Court enter an Order approving this Stipulation;

WHEREAS, on October 12, 2023, Plaintiff filed a class action complaint (ECF No. 1);

WHEREAS, on October 17, 2023, Caesars was served with the Complaint and Summons
(ECF No. 5);

///

WHEREAS, pursuant to Federal Rule of Civil Procedure 12, the deadline for Caesars to answer or otherwise respond to the Complaint is November 7, 2023 (ECF No. 5);

WHEREAS, ten additional actions arising from the same subject matter as Plaintiff's complaint are currently pending in this District;

WHEREAS, The first five of these actions filed in this District have been consolidated, with the lead case being *Rodriguez v. Caesars Entertainment, Inc.*, No. 2:23-cv-01447-ART-BNW (Sept. 15, 2023), and the consolidated action being renamed *In re Data Breach Security Litigation Against Caesars Entertainment, Inc.*, No. 2:23-cv-01447-ART-BNW ECF 21 ("Consolidated Action");

WHEREAS, on November 3, 2023, Caesars filed a Motion to Consolidate Later-Filed Cases into the Consolidated Action, which included Plaintiff's complaint and five others filed on or after October 12, 2023;

WHEREAS, Caesars anticipates that the *Gill* action will be consolidated with the Consolidated Action, and proceed on a coordinated schedule for pre-trial proceedings;

WHEREAS, the parties in the Consolidated Cases have agreed to stay Caesars's deadline to answer or otherwise respond to the complaints pending the filing of a Consolidated Complaint;

WHEREAS, to avoid unnecessary expenditure of resources and effort responding to Plaintiff's individual complaint where all Parties are agreed that the complaint should first be consolidated into the Consolidated Action, and where the Motion to Consolidate Later-Filed Cases is currently pending before the court in the Consolidated Action, the Parties have agreed to extend the time for Caesars to respond to the Complaints until forty-five (45) days following the service of a consolidated complaint, as requested in the Motion to Consolidate Later-Filed Cases, or, if the Court denies the Motion to Consolidate, forty-five (45) days after the Court issues such decision. There is good cause to grant this request, which is not made for the purposes of delay.

It is therefore **STIPULATED** and **AGREED** that:

1. Defendant shall file and serve any answer or other response within forty-five (45) days of the filing of a consolidated complaint, if the pending Motion to Consolidate Later-Filed Cases is granted.

2. If the Motion to Consolidate Later-Filed Cases is not granted, Defendant shall file and serve any answer or other response to Plaintiff's complaint within forty-five (45) days of the Court's decision.

Dated: November 7, 2023.

STRANCH, JENNINGS & GARVEY, PLLC

/s/ Nathan R. Ring
Nathan R. Ring, No. 12078
3100 W. Charleston Boulevard, Suite 208
Las Vegas, NV 89102
Telephone: (725) 235-9750
lasvegas@stranchlaw.com

TYCKO & ZAVAREEI LLP

Sabita J. Soneji (*pro hac vice*)
1970 Broadway, Suite 1070
Oakland, CA 94612
Phone: (510) 254-6808
ssoneji@tzlegal.com

F. Peter Silva, II (*pro hac vice*)
2000 Pennsylvania Avenue, NW, Suite 1010
Washington, D.C. 20006
Phone: (202) 973-0900
psilva@tzlegal.com

Attorney for Plaintiff Dhaman Gill

MCDONALD CARANO LLP

/s/ Adam Hosmer-Henner
Adam Hosmer-Henner (NSBN 12779)
Chelsea Latino (NSBN 14227)
Jane Susskind (NSBN 15099)
100 West Liberty Street, Tenth Floor
Reno, Nevada 89501
(775) 788-2000
ahosmerhenner@mcdonaldcarano.com
clatino@mcdonaldcarano.com
jsusskind@mcdonaldcarano.com

LATHAM & WATKINS LLP

Serrin Turner (*pro hac vice* to be filed)
serrin.turner@lw.com
1271 Avenue of the Americas
New York, New York 10020-4834
Telephone: +1.212.906.1200

*Attorneys for Defendant
Caesars Entertainment, Inc.*

In the interest of avoiding a floating deadline, the Court grants in part and denies in part the parties' stipulation.

IT IS THEREFORE ORDERED that the stipulation (ECF No. 10) is **granted in part and denied in part**. It is granted in part regarding the parties' request that Defendant have additional time to respond to the complaint. It is denied in part regarding the parties' request that the deadline to respond to the complaint be contingent on the granting of the motion to consolidate later-filed cases.

IT IS FURTHER ORDERED that Defendant shall respond to Plaintiff's complaint on or before **December 27, 2023**. If the parties require additional time, they may move to extend this deadline.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: November 9, 2023